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July 18, 2022

**Via ECF & E-Mail**

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

Re: LTL Management LLC, Case No. 21-30589 (MBK)

Dear Chief Judge Kaplan:

On behalf of the Debtor, we have received a copy of the letter that was filed on July 15 by special insurance counsel to the Official Talc Claimants' Committee regarding the Committee's requests for insurance-related documents. Dkt. No. 2719.

The Debtor and the Committee have exchanged correspondence about the Committee's requests, but the two sides have not had an opportunity to meet and confer about them. Until the parties have an opportunity to meet and confer, motion practice on this issue is premature. The Debtor has produced a number of documents requested by the Committee and remains committed to addressing the Committee's outstanding requests.

The Debtor is assessing whether it has additional documents to produce to the requests and anticipates being able to respond to the Committee's July 15<sup>th</sup> letter by July 25. We ask for an opportunity to do so before the Court addresses the Committee's letter.

Respectfully submitted,

/s/ Paul R. DeFilippo

Paul R. DeFilippo

cc: Robert M. Horkovich (*via ECF & E-mail*)